

**Summary of the
Third Annual Meeting of the
National Environmental Laboratory Accreditation Conference
July 28-31, 1997**

INTRODUCTION

The National Environmental Laboratory Accreditation Conference (NELAC) held its Third Annual Meeting July 28-31, 1997 at the Wyndham Anatole Hotel in Dallas, TX. The Meeting was co-sponsored by the U.S. Environmental Protection Agency (EPA) and the Texas Natural Resource Conservation Commission. Approximately 165 individuals from EPA, other federal agencies and state government participated, along with 110 other stakeholders.

The meeting included an opening plenary session in which perspectives on NELAC and the National Environmental Laboratory Accreditation Program (NELAP) were presented. Final committee sessions in preparation for voting were then held. During the voting session, all chapters of the NELAC Standards were adopted by Conference as modified during the committee sessions or in response to floor amendments. The Meeting concluded with overviews of the outcomes of the Meeting and a vision for the future of NELAC.

OPENING PLENARY SESSION

Dr. Charles Hartwig, Chair of the NELAC Board of Directors, presided over the Opening Plenary Session. Proceedings were initiated at approximately 8:30 a.m. on Monday, July 28, 1997. Ms. Sue Phillips of the Texas Natural Resources Conservation Commission (TNRCC), the host organization for the Third Annual Meeting, reviewed various housekeeping details with attendees and introduced TNRCC staff who had been instrumental in preparing for the Annual Meeting. Dr. Hartwig in turn thanked all TNRCC staff for their efforts before introducing Ms. Lynda Carroll, EPA's Acting Deputy Regional Administrator for Region VI. Ms. Carroll provided a brief overview of the progress made by NELAC in the last two years and extended, on the behalf of the City of Dallas, a welcome to all conference attendees.

Dr. Hartwig then recognized Ms. Jeanne Mourrain, NELAC Director, who introduced the members of the NELAC Board of Directors and the chairs of the NELAC Standing and Administrative Committees.

Dr. Hartwig commended everyone for the progress that has been made by NELAC since 1990, and characterized the Third Annual Meeting as a "high-water mark" in NELAC history. The industry is transitioning from one characterized by multiple, expensive, and sometimes conflicting States' programs with overlapping accreditations to one of unified standards, full reciprocity among accrediting authorities, and the potential for lower cost to the laboratories. Dr. Hartwig reminded all that the draft NELAC Standards are not complete; some are too prescriptive while others are too general, and continuous revision will be necessary. He challenged all attendees to work together to approve the current standards by the conclusion of the Annual Meeting.

Comments from the EMMC Panel on Laboratory Accreditation

Dr. Hartwig then introduced Ms. Ramona Trovato, Director of the EPA Office of Childrens' Health Protection and Co-Chair of the Environmental Monitoring Management Council (EMMC) Panel on Laboratory Accreditation. Ms. Trovato expressed her gratitude for the hard work and spirit of cooperation of all who have been involved in the NELAC process over the years. She then itemized specific concerns of the EMMC Panel regarding articles of the NELAC Constitution and Bylaws and various sections of the draft NELAC Standards. These concerns were also conveyed in a series of memoranda from Ms. Jan Jablonski, Co-Chair of the EMMC Panel, to the chairs of the NELAC Standing Committees for discussion and resolution over the course of the Annual Meeting working sessions.

NELAP from the Perspective of the EPA Regions

The viewpoint on the proposed NELAP from the perspective of the EPA Regional Offices was described by Sam Becker, Acting Assistant Regional Administrator for Region VI. In describing the EPA Regions' support the NELAP concept, he mentioned the various types of decisions (on health and environmental issues, in the pursuit of violators, and in the standards setting process) that require the use of laboratory data. In regards to current data quality programs, Mr. Becker cited the Water Supply (WS) Program, the Discharge Monitoring Report Quality Assurance (DMRQA), the Contract Laboratory Program (CLP) for Superfund laboratories, and the National Pollution Discharge Elimination System (NPDES). The lack of reciprocity between these programs and among States often equates to a laboratory being audited as many as 20 times annually at a cost of several tens of thousands of dollars. He also stated that the current number of certified drinking water laboratories falls short of needs. While listing some concerns - the need for increased resources; accreditation of federal laboratories; use of third party assessor bodies; availability of proficiency testing (PT) samples; and auditor training - Mr. Becker also felt strongly that NELAP will do much to strengthen the current State/EPA Region working relationship.

NELAP from the Perspective of the Laboratories' Perspective

Dr. Hartwig introduced Dr. Wilson Hershey, President of Lancaster Laboratories, who presented the viewpoint on NELAP and laboratory accreditation from the laboratory's perspective. He reviewed the progress made in the laboratory accreditation arena, citing the contributions and accomplishments of the American Society of Testing and Materials (ASTM) Committee on Laboratory Accreditation, the National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation (NVLAP), the American Association of Laboratory Accreditation (A2LA), and the Committee for the National Accreditation of Environmental Laboratories (CNAEL). He warned of NELAC issues remaining - approval of the Standards; the extent to which States will participate; the timing of State participation; and the extent to which States will yield their control and influence for the good of reciprocity on a national scope. He characterized the current environmental laboratory business climate as dire, with many laboratories closing and the business of others being off 25%-40%. Laboratories will appreciate the financial relief NELAP will bring through reduced costs for certification including audit fees.

ELAB Recommendations

The Environmental Laboratory Advisory Board (ELAB) provides an opportunity for non-committee participants to provide additional input into the NELAC process. The

recommendations from ELAB were delivered by Dr. Al Verstuyft of Chevron Research and Technology, representing the American Petroleum Institute. He reviewed the numerous recommendations of ELAB, including the following: PT sample selection and approval criteria; a fair assessment protocol for the Proficiency Testing Oversight Body (PTOB); periodic PT studies; long-range NELAC goals that benefit all parties concerned; consistency between NELAP and the EPA PT Externalization Program; the decoupling of NELAC and Good Laboratory Practices (GLP) time lines; the requirement that EPA demonstrate achievable results with current technology before a new standard is promulgated; the desirability to accredit the first, large group of accrediting authorities simultaneously; the flexibility to allow laboratories to use current PT providers until PT providers are approved under NELAP; better definition of “conflict-of-interest”; and EPA Program Offices becoming more active in promulgating standards that are consistent with NELAC. In spite of these concerns and recommendations, the ELAB also recommended that the current NELAC Standards, with minor modifications, be adopted during the Third Annual Meeting.

NELAP from the Perspective of the EPA Program Offices

A series of presenters provided viewpoints on NELAP from the perspectives of three EPA Program Offices. The first was Steve Clark from the EPA’s Office of Water, who summarized the effects of the Clean Water Act and the Safe Drinking Water Act on the creation of drinking water programs. He described the myriad of water programs that resulted from these pieces of legislation, including programs for drinking water, groundwater protection, and injection pollutant programs. He described the current level of interaction between States and the Regions regarding drinking water programs, and expressed specific concerns about problems that small (one-man) water laboratories may have in meeting all the requirements if the NELAC Standards.

Barry Lesnik presented the views of the Office of Solid Waste and Emergency Response (OSWER), under whose jurisdiction fall the Superfund and Resource Conservation and Recovery Act (RCRA) programs. Because neither Superfund nor RCRA has an accreditation program, OSWER strongly supports the NELAP concept. With the multimedia nature of its program, OSWER has adopted a performance-based measurement system (PBMS) that Mr. Lesnik finds incompatible with Chapter 5 of the NELAC Standards. Mr. Lesnik identified the three functions of proficiency materials - laboratory accreditation samples, proficiency testing samples, and quality control samples. OSWER would like to identify, through NELAP, a source for high-quality, multimedia PT samples in clean matrices. OSWER also desires an accreditation program based on analyte class and not method. The Program Office also prefers laboratory evaluation emphasizing qualitative and not quantitative analysis, but with any quantitative analysis graded in comparison to true values and not to consensus values. Specific concerns about NELAP that Mr. Lesnik raised included the fact that NELAP guidelines are more rigid than those of OSWER; that the NELAC definition of “mobile laboratory” is too strict; and that the NELAC Standards do not recognize OSWER’s flexible data quality objective (DQO) approach or PBMS approach.

Mr. Don Marlow presented the viewpoint of the Office of Prevention, Pesticides, and Toxic Substances (OPPTS). He pointed out that, within the Office of Pollution Prevention and Toxics (OPPT), laboratories are accredited for analysis for asbestos, lead, and polychlorinated biphenols (PCBs). Within the Office of Pesticide Programs (OPP), there exists a registration/reregistration program for laboratories analyzing for pesticides in foods (tolerances), pesticide products (label

claims), and environmental samples (study claims). For the OPPT program areas, laboratories are subject to either federal or state oversight; in the OPP programs, oversight is by the states, the Food and Drug Administration (FDA), the Department of Agriculture (USDA) or EPA's Office of Enforcement and Compliance Assurance (OECA). For the asbestos, lead, and PCB analyses, EPA standard methods are used for compliance monitoring; for pesticides, FDA/USDA and/or manufacturer's methods are used.

Finally, Mr. Dan Bivins spoke on behalf of the Office of Air and Radiation (OAR). He described that, within OAR, the Office of Radiation and Indoor Air (ORIA) currently covers indoor air radon testing and radionuclide air emission testing; the Office of Mobile Sources (OMS) handles vehicle testing, engine testing, and fuels analysis; the Office of Air Quality Planning and Standards (OAQPS) does emission and ambient monitoring and testing, and standards development; and the Office of Atmospheric Programs (OAP) does acid rain testing and monitoring and stratospheric protection testing. While OAR staff currently serve on at least three NELAC committees, OAR is currently forming a working group to assist these program offices in becoming even more actively involved in the NELAC process. Mr. Bivins pledged continued OAR support for NELAC through technical assistance in developing the NELAC Standards, committee representation, NELAC home page administration, and assistance in assessing States' programs.

Overview of the Meeting

Ms. Jeanne Mourrain then outlined the schedule of events for the remainder of the conference week. She reviewed the meeting schedule for the NELAC Standing and Administrative Committees, and reminded everyone that the voting session for the NELAC Standards would be Thursday morning. An EMMC presentation was announced for Thursday morning.

STANDING COMMITTEE WORKING SESSIONS

Working sessions for NELAC Standing Committees preparing chapters of the NELAC Standards for voting were held from 12:30 p.m. to 5:00 p.m. on Tuesday, July 29 according to a prepared agenda. The full summary minutes are posted on the NELAC web site; highlights of the committee sessions follow.

The **Program Policy and Structure** committee met to consider changes to the Constitution and Bylaws and to Chapter One of the NELAC Standards under the direction of its chair, Dr. Kenneth Jackson of the New York State Department of Health. He noted that these are living documents, expected to undergo changes in the future. Changes as a result of discussions at the Second NELAC Interim Meeting were discussed. Comments supplied by the NELAC Coordinating Committee, Department of Defense, and the EMMC Laboratory Accreditation Panel were discussed. Issues for voting were prepared.

The **Proficiency Testing** (PT) committee met to consider changes to Chapter Two of the NELAC Standards under the direction of its chair, Ms. Andrea Jirka of USEPA, Region 7. She noted that the body of the chapter is complete and being revised, that four appendices are completed, and four additional appendices are in various stages of development. Comments supplied by the EMMC and the ELAB were considered. Issues of PT sample scheduling and logistics were discussed. The role of the PT Oversight Body (PTOB) was discussed, and its

relationship to the National Institute of Science and Technology (NIST), was discussed. Discussion of appendices was limited to Appendices A-C for lack of time. Issues for voting were prepared.

The **On-Site Assessment** committee met to consider changes to Chapter Three of the NELAC Standards under the direction of its chair, Mr. Gary Bennett of USEPA, Region 4. He noted that the portions of the chapter not yet approved would be addressed as the primary topic, followed by discussion of the draft Assessor Training Manual, and then other comments on the Standard as time permitted. Development of assessor training materials and standardized checklists were noted as action items. Issues for voting were prepared.

The **Accreditation Process** committee met to consider changes to Chapter Four of the NELAC Standards under the direction of its chair, Ms. Margaret Prevost of the New York State Department of Health. She noted that the purpose of this session is to prepare unadopted sections of the chapter for voting, and then to address comments received from EMMC and DOD. Additional discussion on mobile laboratories and accreditation requirements for multi-site laboratory organizations. Issues for voting were prepared.

The **Quality Systems** committee met to consider changes to Chapter Five of the NELAC Standards under the direction of its chair, Ms. Sylvia Labie of the Florida Department of Environmental Protection. She explained that in this session proposed changes to the chapter would be explained. At a later date, detection limits, Performance Based Measurement Systems (PBMS), and additional test methods will be addressed. Issues for voting were prepared.

The **Accrediting Authority** committee met to consider changes to Chapter Six of the NELAC Standards under the direction of its chair, Mr. John Anderson of the Illinois Environmental Protection Agency. He started by leading the group through an overview of the chapter. Comments from EMMC were discussed; additional issues were identified and comments from DOD were deferred for subsequent committee sessions. Issues for voting were prepared.

ADMINISTRATIVE COMMITTEE WORKING SESSIONS

Working sessions for NELAC Administrative and *ad hoc* Committees were held from 9:00 a.m. to 12:00 Noon on Wednesday, July 30. The full summary minutes are posted on the NELAC web site; highlights of the committee sessions follow.

The **Conference Management** administrative committee met under the direction of its chair, Ms. Marion Thompson of the US EPA Office of Water. She explained that the purpose of this session was to discuss issues related to future NELAC national meetings. Topics discussed included the possibility of co-sponsorship of meetings, exhibitors, and conference fees. It was noted that future annual meetings are planned to be held in the home State of the presiding NELAC chair; hence the 1998 annual meeting will again be held in Texas.

The **Field Measurements** *ad hoc* committee met under the direction of its chair, Dr. Barton Simmons of the California Environmental Protection Agency. Results of the Field Activities Survey were distributed and discussed. The difficulties posed by the wide range of “laboratory”

operations that are performed under field conditions was discussed. Additionally, the importance of sample collection was discussed as an issue integral to consideration of measurement data quality. A draft document on field testing under preparation by the Navy was discussed for possible use by this committee in directing NELAC efforts for field activities. Several recommendations were discussed for presentation to NELAC, including the inclusion of sampling under a field activities standing committee.

The **Membership and Outreach** administrative committee met under the direction of its co-chairs, Dr. Irene Ronning of the Oregon Public Health Laboratories and Mr. George Mills of the Vermont Department of Health Laboratories. Following review of the desired outcomes of the meeting, Dr. Ronning was elected as chair of the committee. Discussion included credentials of voting members, NELAC fact sheet, letters to governors introducing NELAC, and the NELAC web site.

The **Implementation** standing committee met under the direction of its chair, Ms. Jan Jablonski of the US EPA Office of Research and Development. The NCSL survey was nearly ready for distribution and model legislation is being developed to assist the States in implementation. The cost of accreditation, especially impacting small laboratories, was discussed. Outreach efforts were recognized as essential and this committee will cooperate with the Membership and Outreach committee in this area.

The **National Database** *ad hoc* committee met under the direction of its chair, Dr. Roger Carlson of the Kansas Department of Health and Environmental Laboratories. He noted that the purpose of this session was to discuss major issues essential to the structure, function and operation of the NELAC database, responding to the specifications stated in the NELAC Standards. Issues discussed included hardware/software options, possible modes of user access, operational issues, and an initial list of primary data elements.

The **Transition** *ad hoc* committee met under the direction of its chair, Ms. Carol Batterson of the Texas Natural Resources Conservation Commission. She noted that this committee should anticipate issues and problems that might arise in the implementation of the NELAC Standards, and to develop a plan to assist the NELAP director during this transition period. Discussion included review of the recommendations prepared by this committee, a review of a survey sent to the States to estimate their initial intent to become a NELAP accrediting authority, the application process for accrediting authorities, and the issue of supplemental State requirements.

In the afternoon of Wednesday, July 30, 1997, reports on the outcome of each working session were presented to participants, as was a review of the voting session scheduled for the next morning.

VOTING SESSION

NELAC participants convened at 9:00 am Thursday, July 31, 1997 for the voting session. Voting issues prepared in the previous committee sessions were presented by respective chairs of standing committees having responsibility for chapters of the Standards. The significant outcome of this session was adoption of the full set of NELAC Standards by the Conference. The voting

report is attached.

In his closing observations, Dr. Hartwig introduced the following items for consideration as a "sense of the Conference", for which there was overwhelming support:

- That the NELAC PT committee, EPA, and NIST staff work together to develop a consistent set of Proficiency Testing Program Standards for the EPA/NIST Externalized PT Program,
- That the NELAC PT Committee, jointly with EPA and NIST, report to NELAC at the 1998 Interim NELAC meeting on consensus reached or issues remaining,
- That as with all NELAC Standards, modification to the NELAC PT Standards will be published in advance of, discussed, and voted on at NELAC IV,
- That every effort be exerted to develop a single set of standards for implementation of a Proficiency Testing Program for environmental analysis.

CLOSING PLENARY SESSION

Participants reconvened at 1:30pm for the closing plenary session.

Mr. Robert Graves, of the US EPA Office of Research and Development, gave an overview of the status of the Water Performance Evaluation (PE) Studies Externalization efforts being undertaken jointly by EPA and NIST. He noted that the PE studies are classified as a routine technical service, which EPA is considered to no longer be within ORD's mission; hence it is necessary to consider alternate solutions. He reviewed these efforts, beginning with the convening of the 1994 PE study re-design work group, including recent planning meetings with NIST, noting that September 1998 is the target date for completion of EPA's externalization efforts. A PE studies model was described, including the roles of EPA, NELAC, NIST and other stakeholders. He also showed the proposed schedule for the final PE studies to be conducted by EPA, which is scheduled to be concluded by November 1998.

Ms. Reenie Parris outlined the approach NIST is taking to accredit PE study providers in cooperation with EPA's externalization program. She described the process and schedule for developing accreditation criteria which will be published in NIST Handbook 150-XX. She noted that these criteria will be consistent with other national and international criteria (e.g., ISO Guide 58) and will address accreditation of study providers, provision of benchmark materials, and oversight of the entire program.

Ms. Jeanne Mourrain then closed the voting session by summarizing the "next steps" to be anticipated in the development of NELAC and NELAP.

NELAC III Voting Summary

July 31, 1997

No. (b)	ISSUE	REPRESENTATIVES				DELEGATES			
		% Yea	Yea	Nav	Abst	% Yea	Yea	Nav	Abst
1	AMENDED CONSTITUTION as proposed by Program Policy & Structure Committee	99%	67	1	0	100%	87	0	0
2	AMENDED BYLAWS as proposed by Program Policy & Structure Committee	100%	68	0	0	100%	87	0	0
3	PROGRAM POLICY & STRUCTURE Chapter 1	99%	67	1	0	98%	84	2	0
4	PROFICIENCY TESTING Entire Chapter 2, including Appendices A-D	85%	56	10	0	81%	71	17	0
5	ON-SITE ASSESSMENT 3.2.2 Basic Qualifications	90%	61	6	1	80%	71	16	2
6	ON-SITE ASSESSMENT 3.4.5 Confidential Business Information	96%	65	2	1	99%	89	1	0
7	ON-SITE ASSESSMENT 3.6.1 Assessor's Training Manual	96%	64	1	2	93%	81	6	0
8	ON-SITE ASSESSMENT 3.6.4 Assessment Standards	94%	62	2	2	94%	81	4	1
9	ACCREDITATION PROCESS 4.1.1 Personnel Qualifications	3%	2	58	8	6%	6	78	12
10	ACCREDITATION PROCESS 4.1 modify 4.1.1.1 (h) "A person who does not meet the education credentials or experience ..."	41%	28	33	7	36%	32	50	8
11	ACCREDITATION PROCESS modify 4.1.1.1 by removal of subsections (a) through (h) regarding qualifications of the party of record.	85%	57	7	3	86%	76	11	1
12	ACCREDITATION PROCESS 4.1.2 On-Site Assessment 4.1.4 Proficiency Testing	94%	64	4	0	92%	80	7	0
13	ACCREDITATION PROCESS 4.5.1 Interim Accreditation, 4.5.2 Revocation of Interim Accreditation	84%	57	7	4	91%	79	8	0
14	ACCREDITATION PROCESS 4.1.3 Corrective Action Reports 4.3.1 Quality Systems	95%	63	1	2	99%	84	1	0
15	ACCREDITATION PROCESS 4.4.1 Denial 4.4.2 Suspension 4.4.3 Revocation	94%	63	2	2	98%	80	2	0
16	QUALITY SYSTEMS - New sections 5.5.3.4, 5.13, 5.14 Appendix C, Appendix D (1.1.b.4 and 4), Definitions	92%	61	4	1	89%	77	6	4
17	QUALITY SYSTEMS - language changes 20 changes detailed in published voting agenda	90%	60	6	1	88%	75	9	1
18	ACCREDITING AUTHORITY Entire Chapter 6	95%	63	1	2	95%	82	3	1

NELAC III Representatives^a Voting Record

July 31, 1997

Vote No. (b)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
AL	Y	Y	Y		Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
AK	Y	Y	Y	N	Y	Y		N	N		Y	Y	Y	Y	Y	Y	Y	Y
AZ	Y	Y	N	N	N	N	N	N	N		N	N	N	N	N	N	N	N
AR	Y	Y	Y	N	N	N	Y	Y	N	N	Y	N	Y	Y	Y	Y	Y	Y
AS (c)																		
CA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
CO	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
CT	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
DE	Y	Y	Y		Y	Y	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
FL	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
GA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	N	Y
GU (c)																		
HI	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
ID																		
IL	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
IN	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y
IA	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
KS	Y	Y	Y	Y	Y	Y	Y		N	Y	N	Y	Y	Y	Y	Y	Y	Y
KY	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
LA	Y	Y	Y	N	Y	Y	Y	Y	N		Y	Y	Y	Y	Y	Y	Y	Y
ME	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
MD	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
MA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	N	Y	Y	Y	Y	Y
MI	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
MN	Y	Y	Y	Y	Y	Y		Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y
MS	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
MO	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
MT	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	
NE																		
NV	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
NH	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y	N	Y	Y	Y	Y	Y
NJ	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
NM	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
NY	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y
NC	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y	N	Y	Y	Y	Y	Y
ND																		
NMI (c)	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
OH	Y	Y	Y	Y	Y	Y	Y	Y	N		Y	Y	Y	Y	Y	Y	Y	Y
OK	Y	Y	Y	Y	Y	Y	Y	Y	N		Y	Y	Y	Y	Y	Y	Y	Y
OR	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
PA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
PR (c)	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
RI																		
SC	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	N	N		N	Y	N	Y
SD	Y	Y	Y	Y	N	Y	Y		N	N	Y	N	Y	Y	Y	Y	Y	Y
TN	Y	Y	Y	Y	Y	Y	Y	Y	N		Y	Y	Y	Y	Y	Y	Y	Y
TX	Y	Y	Y	Y	Y	Y	Y			N	Y	Y	Y	Y	Y	Y	Y	Y
UT	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
VT	Y	Y	Y	Y	Y	Y	Y	Y	N		Y	Y	Y	Y	Y	Y	Y	Y
VA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y		Y	Y
VI (c)																		
WA	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
wDC																		
WV	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
WI	Y	Y	Y	Y	Y	Y	Y	Y		N	Y	Y	Y	Y	Y	Y	Y	Y
WY																		

^a See NELAC III list of Representatives and Alternates, page 5

^b See NELAC III Voting Summary, page 1

^c U.S. Territories: American Samoa, Guam, Northern Mariana Islands, Puerto Rico, Virgin Islands

NELAC III Representatives^a Voting Record

July 31, 1997

Vote No. (b)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
DOA	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y			
DOC																		
DOD	Y	Y	Y	N	N	Y	Y	Y	N	Y	N	Y	Y	Y	Y	Y	Y	Y
DOE	Y	Y	Y	Y	Y	Y	Y	Y	N	N		Y	Y					
DOI	Y	Y	Y	Y	N	Y	Y	Y	N	Y		Y	Y	Y	Y	Y	Y	Y
DHHS																		
NRC																		
NIOSH																		
TVA																		
HUD																		
R1	Y	Y	Y	Y	N	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
R2	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
R3	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
R4	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
R5	Y	Y	Y	N	Y	Y	Y	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y
R6	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
R7	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
R8	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y	N	Y	Y	Y	Y	Y
R9	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y		Y	Y	Y	Y	Y
R10	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
OSWER	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y				N	N	Y
OAR	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
ORD	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
OW	Y	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y
OPPTS	Y	Y	Y	N					N	Y		Y				N	N	
OECA	Y	Y	Y	Y	Y	Y	Y	Y	N	Y		Y		Y	Y	N	N	Y
OROSLR	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y

^a See NELAC III list of Representatives and Alternates, page 5

^b See NELAC III Voting Summary, page 1

^c U.S. Territories: American Samoa, Guam, Northern Mariana Islands, Puerto Rico, Virgin Islands

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